

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

TIWAUN DOMINIQUE EDWARDS

Case No. Case: 2:24-mj-30502  
Assigned To : Unassigned  
Assign. Date : 11/20/2024  
Description: CMP USA V. TIWAUN  
DOMINIQUE EDWARDS (DA)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 14, 2024 in the county of Wayne in the  
Eastern District of Michigan SD, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in Possession of Ammunition

This criminal complaint is based on these facts:

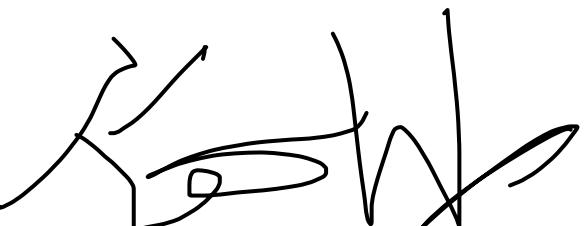
SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

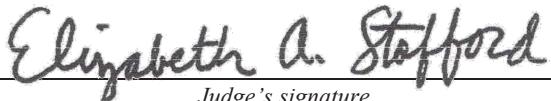
Date: November 20, 2024

City and state: Detroit, Michigan



Complainant's signature

Kenton Weston, Special Agent - ATF  
Printed name and title



Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge  
Printed name and title

## **AFFIDAVIT**

I, Kenton Weston, being duly sworn, depose and state the following:

### **INTRODUCTION**

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), and have been since January 2018. I graduated from the ATF Privately Made Firearm (PMF) and Machine Gun Conversion (MCD) Train the Trainer Course, Criminal Investigator Training Program, and the ATF Special Agent Basic Training Program. During my employment with ATF, I have conducted and/or participated in over a hundred criminal investigations focused on firearms, drug trafficking violations, and criminal street gangs in the Eastern District of Michigan, which have resulted in the seizure of illicit controlled substances, hundreds of firearms, and more than one hundred and seventy- five arrests.

2. I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7), and I am empowered to conduct investigations and make arrests of offenses enumerated under federal law.

3. I am currently assigned to the Pontiac Gun Violence Task Force (GVTF), a task force established by the Oakland County Sheriff’s Office (OCSO) and the ATF. Additionally, I am a member of the ATF led Crime Gun Enforcement Team (CGET). The GVTF and the CGET are tasked with investigating the unlawful

possession of firearms and violent firearm crimes committed within the city of Pontiac, Oakland County, and the Eastern District of Michigan.

4. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of reports by myself and/or other law enforcement agents, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all the information known to law enforcement related to this investigation.

5. The ATF is currently conducting a criminal investigation concerning Tiwaun Dominique EDWARDS (DOB: XX/XX/1992), for violations of 18 U.S.C. § 922(g)(1) (Felon in Possession of Ammunition).

### **PROBABLE CAUSE**

6. On November 14, 2024, at approximately 5:36 pm, Detroit Police Department (DPD) officers were working in a semi-marked scout car and observed a black 2012 Ford Fusion Michigan in the area of 7 Mile Rd and Greenview St in Detroit, MI, with illegal front window tints.

7. The officers illuminated the Ford Fusion and observed the driver, later identified as EDWARDS, leaning the right side of his body towards the back seat

floorboard. The officers observed EDWARDS right arm quickly moving while still leaned over, an action consistent with someone attempting to conceal or retrieve a weapon or contraband.

8. At this juncture, the officers initiated a traffic stop on the Ford Fusion. As the officers exited out their scout car, they observed EDWARDS exit out the driver seat of the vehicle very quickly as if he was distancing himself from the vehicle. As the officers approached EDWARDS, the officers used their flashlight to illuminate the rear seat of Ford Fusion and observed a firearm. The firearm was a tan and black PMF AR-15 chambered in 9mm, with no serial number, and an inserted extended magazine loaded with (12) live 9mm rounds. EDWARDS was arrested and transported to the Detroit Detention Center (DDC).



(Image 1 – PMF AR-15, no serial number, 9mm caliber firearm)

9. Subsequently at the DDC, DPD detectives conducted an audio and video recorded post-Miranda interview with EDWARDS. I reviewed the footage which revealed, EDWARDS claimed ownership of the vehicle, knew that his windows were tinted, admitted to owning the recovered 9mm firearm since approximately 2021, knew he “wasn’t suppose to have the gun”, and is on federal supervised release.

10. On November 19, 2024, I provided ATF Interstate Nexus Expert Special Agent Kara Klupacs images and a description of the recovered Turan Ammunition, 9mm caliber ammunition. Special Agent Klupacs concluded that all the ammunition was manufactured outside the State of Michigan.



(Image 2 – Turan Ammunition, 9mm caliber ammunition)

11. I conducted a search using the Law Enforcement Information Network (LEIN), which showed that in May of 2014, EDWARDS pleaded guilty to Attempt-

Felony Weapons-Carrying Concealed in the 3<sup>rd</sup> Circuit Court for Wayne County, Michigan.

12. I also reviewed records of the U.S. District Court for the Eastern District of Michigan and related ATF Reports that I previously authored pertaining to EDWARDS, which revealed the following:

- a. On July 27, 2021, at approximately 11:20 pm, Livonia Police Department (LPD) Officers were dispatched to a corner located in the Eastern District of Michigan for a reported Felony Assault stemming from a “road rage” incident, that occurred between two vehicles. When officers arrived, they spoke to the victims who stated a black male, later identified as EDWARDS, pointed a “silver and black handgun with extended clip” at their vehicle containing two adults and eight juveniles.
- b. The victims stated that after waiting behind the Ford Fusion at an intersection for approximately one minute, the victims used their horn to alert EDWARDS, as the driver of the silver Ford Fusion, that the traffic light had turned green. The Ford Fusion proceeded through the intersection. The victims turned the same direction as the Ford Fusion and pulled next to it at an intersection. Moments later, EDWARDS began waving and pointing the firearm at the victims. EDWARDS continued to follow the victims as they made a turn to avoid further

confrontation. One of the victims was able to capture a photo of the vehicle and license plate. Using the plate number in that photo, officers were able to locate EDWARDS' residence where they located EDWARDS and a loaded silver and black Taurus G3 9mm caliber pistol in plain view on the floor on top of some clothing. The pistol contained an extended magazine and several of its serial numbers were rigorously scratched off.

13. As a result of this incident, EDWARDS was indicted in the U.S. District Court for the Eastern District of Michigan for violations of 18 U.S.C. § 922(g)(1). On November 29, 2022, having been convicted by guilty plea, EDWARDS was sentenced by United States District Judge Laurie J. Michelson to 16 months in prison and 24 months supervised released for violations of 18 U.S.C. § 922(g)(1).

14. EDWARDS began serving his two-year term of supervised release on January 12, 2024, which included a condition that he “must not own, possess, or have access to a firearm, ammunition[.]” That condition prohibited EDWARDS from possessing the above-described firearm and ammunition that was seized from him on November 14, 2024.

15. As a result, at the time he knowingly possessed the above-described firearm and ammunition, EDWARDS knew that he had been convicted of an offense

punishable by more than one year of imprisonment because he actually served more than one year of imprisonment.

## CONCLUSION

16. Probable cause exists to believe that on November 14, 2024, Tiwaun Dominique EDWARDS knowingly possessed ammunition after having been convicted of a felony offense, which he knew was punishable by more than one year of imprisonment, in violation of 18 U.S.C. § 922(g)(1). These violations occurred within the Eastern District of Michigan.



Kenton Weston, Agent  
Bureau of Alcohol, Tobacco, Firearms and  
Explosives

Sworn to before me and signed in my presence  
And/or by reliable electronic means

Elizabeth A. Stafford  
Honorable Elizabeth Stafford  
United States Magistrate Judge

Dated: November 20, 2024